## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES	)	
	) )	
v.	) )	
	)	Cr. No. 04-10345-NMG
MOHAMMED ABDUL RASHEED	)	
QURAISHI, MOHAMMED ABDUL	)	
QAYIUM QURAISHI, and MOHAMM	ED )	
ABDUL AZIZ QURAISHI	)	
	)	

## EMERGENCY MOTION OF DEFENDANTS QAYIUM QURAISHI AND RASHEED QURAISHI TO EXTEND THEIR SELF-SURRENDER DATE FOR ONE WEEK

Through this motion, Defendants Qayium Quraishi and Rasheed Quraishi (collectively, "Defendants"), respectfully request that this Court extend their self-surrender date for one week, until May 25, 2007. In support of this motion, Defendants state as follows:

- 1. Defendants were sentenced in this matter on March 30, 2007.
- 2. On April 11, 2007, a Judgment was entered against each of the Defendants. (See Docket Nos. 114, 115).
- 3. Presently, Defendants are required to self-surrender to the facility located in Big Spring, Texas before 2 p.m. on Friday, May 18, 2007.
- 4. After their Sentencing, Defendants were told by the Probation Service that they would receive notice of their respective prison designations by mail.
- 5. Defendants' brother, Aziz Quraishi ("Aziz"), is a co-defendant in this action, and was also scheduled to self-surrender on May 18, 2007 to the Big Spring, Texas, facility. On May 16, 2007, Aziz moved for a one-week extension of time, until May 25, 2007, to report to Big

Spring, given that he has not vet received written notice of his designation. The Court granted Aziz's request on May 16, 2007, thereby requiring him to self-report to Big Spring by May 25. 2007.

- 6. On May 17, 2007, Defendants' counsel received an email from the United States Probation Officer informing them that they would not receive any written notice of their designation.
- 7. In light of the Court's grant of an additional week for Aziz to self surrender, Defendants hereby request an additional week, until May 25, 2007, to self surrender, to allow them to travel together with Aziz to Big Spring and report simultaneously. Indeed, Aziz and Qayium reside in the same house in Stoughton, Massachusetts, and so such travel arrangements are practical.
  - 8. The Government does not assent to the requested relief.

WHEREFORE, Defendants respectfully request that this Court grant their request for a one-week extension of their self-surrender date.

Respectfully submitted,

MOHAMMED ABDUL QAYIUM QURAISHI,

By his attorneys,

MOHAMMED ABOUL RASHEED QURAISHI,

By his attorneys,

/s/ Jill Brenner Meixel

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Dated: May 17, 2007

/s/ Frank A. Libby, Jr.

Frank A. Libby, Jr. (BBO# 299100) John J. Commisso (BBO# 647002) Kelly, Libby & Hoopes, P.C. 175 Federal Street Boston, MA 02110 (617) 338-9300

## **Certificate of Service**

I hereby certify that this Motion filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 17, 2007.

/s/ Jill Brenner Meixel Jill Brenner Meixel